January 10, 1993

Mr. William F. Canton Acting Secretary Federal Communications Commission 1919 M Street NW Washington, D.C. 20554

RE: CC Docket 93-292

Dear Mr. Canton:



It was with great interest I read the recent FCC Notice of Proposed Rulemaking concerning Toll Fraud. As a telecommunications professional who is responsible for my company's communications systems, I am encouraged by the proposed rulemaking because even though I have taken each and every protective step recommended by the IXC's and CPE vendors to secure my systems, I can still experience toll fraud. It is impossible to secure my system 100% from fraud.

PBX owners should not be responsible for 100% of the toll fraud if we don't control 100% of our destiny. Since our destiny is not only controlled by our PBX security precautions, but also by the information, services and equipment provided IXCs, LECs and CPEs, the law should reflect that. It is preposterous to think that the IXCs, LECs and CPEs who all have a very important part in this issue, have absolutely no legal obligations to warn customers and therefore, no real incentive to stop fraud.

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Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

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Sincerely,



ROWE INTERNATIONAL, INC. GRAND RAPIDS PLANT 1500 UNION AVE., SE GRAND RAPIDS, MI 49507-1884 TEL: (616) 243-3633

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Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

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Sincerely,

Cherrie Hoffman

EASTERN IDAHO REGIONAL MEDICAL CENTER____

"Quality People, Quality Care"

January 10, 1993

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Idaho Falls, Idaho 83404 P.O. Box 2077, 83403-20-7 (208) 529-6111



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Sincerely,

Shauna M. Smith

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

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Sincerely,

Vern D. Olson

Director of Communications

UTAH COUNTY

2855 South State Street

Provo, Utah 84606

801-370-8600

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January 10, 1993

22ND DISTRICT AGRICULTURAL ASSOCIATION State of California

Mr. William F. Canton Acting Secretary Federal Communications Commission 1919 M Street NW Washington, D.C. 20554

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Sincerely,

Jayle Hornbeak

Carriester Content 1,21 McKenney Forton (2) P.D. Fox 3645 Emistor Rexas 7, 250 (365) Silendors 1,3 851,7,810



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Sincerely.

Barbara McCusker

Sr. Telcommunications Analyst



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Sincerely,

Withed FEIEZ System Manager



Carle Clinic Association

602 West University Avenue, Urbana, IL 61801 Phone: (217) 383-3311

IN FURTHER CORRESPONDENCE REFER TO CHART NUMBER: January 10, 1993

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HARLAN J. FAILOR, MD
KEVIN B. GARNER, MD
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JOHN F. STOLL, MD
MARK J. ZAWODNIAK, MD
Aliergy - Adult Adult Medicine

Allergy - Adult ROBERT E. SOSTHEIM, MD JOHN ZECH, MD

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Cardiovascular & Thoracic Surgery TIMOTHY L. CONNELLY, MD L. SCOTT COOK, MD, PHD

Colon and Rectal Surgery JULIUS C. BONELLO, MD LYN E. TANGEN, MD

Dermatology SIDNEY A. HOCHMAN, MD ANN E. TICE, MD ROBERT L. WOLF, MD

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PAUL A. SCHAAP, MD

THOMAS C. SCHREPFER, MD

JOHN R. SELLETT, MD

MICHAEL L. SHOEMAKER, MD Family Practice

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ROBERT J. TURNGREN, MD
KURT J. WARKENTHIEN, MD
EDWARD S. WARREN, MD
PETRA K. WARREN, MD
DAVID K. WEBB, MD
DAVID L. WHITEHILL, MD
MICHAEL J. WOODS, MD
PAUL W. YARDY, MD
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Pediatrics

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ROBERT B. DANLEY, MD
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JON A. HENDRICKSON, MD
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RICHARD P. TAYLOR, MD

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I applaud the provisions outlined in the NPRM on shared liability. They are fair and equitable. Shared liability will require clear definitions of the specific responsibilities of the CPE owner to secure their equipment, the manufacturer to adequately warn the customer of the of the toll fraud risks associated with features of the CPE, and the IXCs and LECs to offer detection and prevention programs and educational services. If toll fraud occurs and one of the parties should fail to meet these responsibilities and prove to be negligent, then they should bear the cost of the fraud. I do not believe any damages should be awarded to the aggrieved parties. Should all parties have met the aforementioned responsibilities, and toll fraud occurs, then liability should be shared equally.

However, shared liability only addresses the symptom of the problem of toll fraud and not the cause.

The root of this insidious crime of toll fraud is the hacker community. As the information highway widens, so do the endless opportunities for hackers to compromise our communication systems. I do not believe it when the hackers state they only 'hack' to gain knowledge. If this were the case, there wouldn't be a toll fraud problem. While it is the hacker who breaks in to the systems and sells the information, it is the call sell operations that truly profit from it.

Until we come up with an adequate method for law enforcement to catch and prosecute these criminals, toll fraud will continue to grow beyond the \$5 billion problem it is today. We must develop legislation that clearly defines and penalizes this criminal activity and gives law enforcement the tools it needs to track and prosecute the perpetrators of toll fraud.

Toll fraud is an illegal, fraudulent theft of service. I am encouraged that if we all work together we can make a positive impact on this terrible problem.

Sincerely,

Lauri Pforr

Telecommunications Manager Carle Clinic Association

Tuna Han



ELECTRIC MANUFACTURING COMPANY

January 10, 1993

HECEIVED

JAN 1 9 1994

FCC MAIL ROOM

Mr. William F. Canton Acting Secretary Federal Communications Commission 1919 M Street NW Washington, D.C. 20554

RE: CC Docket 93-292

Dear Mr. Canton:

It was with great interest I read the recent FCC Notice of Proposed Rulemaking concerning Toll Fraud. As a telecommunications professional who is responsible for my company's communications systems, I am encouraged by the proposed rulemaking because even though I have taken each and every protective step recommended by the IXC's and CPE vendors to secure my systems, I can still experience toll fraud. It is impossible to secure my system 100% from fraud.

PBX owners should not be responsible for 100% of the toll fraud if we don't control 100% of our destiny. Since our destiny is not only controlled by our PBX security precautions, but also by the information, services and equipment provided IXCs, LECs and CPEs, the law should reflect that. It is preposterous to think that the IXCs, LECs and CPEs who all have a very important part in this issue, have absolutely no legal obligations to warn customers and therefore, no real incentive to stop fraud.

CPEs should be required to provide warnings about the risks of toll fraud with their equipment and provide recommended counter methods. It is critical that CPEs ship equipment without default passwords which are well known within the hacker community. Passwords should be created during the installation of the equipment with the customers full knowledge. CPEs should be required to include security-related hardware and software in the price of their systems. When you buy a car, the lock and key are provided in the design and price of the car. Not an adjunct that you have to purchase later.

While the programs offered by IXCs, such as MCI Detect, AT&T NetProtect and Sprint Guard have broken new ground in relation to preventing toll fraud, they still don't do enough. Some of these services are too expensive for smaller companies and the educational information is superficial. Monitoring by the IXCs should be a part of the basic interexchange service offerings, as all companies, large and small, are vulnerable to toll fraud. If the IXCs were monitoring all traffic, there wouldn't be any cases of toll fraud for periods longer than a day.

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Betty Becker

Sincerely

Systems Administration

January 10, 1993

RECEIVED

JAN 1 9 1994

FCC MAIL ROOM

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

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Sincerely,





January 12, 1994

JAN 1 9 1901

Mr. William F. Canton Acting Secretary Federal Communications Commission 1919 M Street NW Washington, DC 20554

RE:

CC Docket 93-292

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As hackers begin new methods of breaking into systems by using local lines instead of 800 numbers, the LECs should be required to offer monitoring services similar to the IXCs.

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Mr. William F. Canton January 12, 1994 Page Two

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Sincerely,

Becki Cherry

Facilities/Telecommunications Coordinator



st. margaret's hospital

600 East First Street

Spring Valley, Illinois 61362

815-664-5311 815-223-5346

January 12, 1994 FECEIVED

JAN 19 1994

FCC MAIL ROOM

Washington, D.C. 20554
RE: CC Docket 93-292

Federal Communications Commission

Mr. William F. Canton

Acting Secretary

1919 M Street NW

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Applicate A Solvenia